

Case No: 17-43890-ELM-13

## UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF TEXAS

Fort Worth Division

In re: ANGEL REE SANSOM

Case No: 17-43890-ELM-13

Chapter: 13

Property Address: 2316 WESTBROOK DR, CARROLLTON, TX 75007

Last four digits of any number you use to

Identify the Debtor's account: 0390

Court Claim No. (if known) 12

### STATEMENT IN RESPONSE TO NOTICE OF AMOUNT DEEMED NECESSARY TO CURE MORTGAGE ARREARS UNDER L.B.R. 3002-2

#### FIRST UNITED BANK & TRUST

("Creditor") hereby responds to that certain Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("Cure Notice") dated March 19, 2019 and filed as Docket 37 that as of the date of this response Creditor:

#### Pre-Petition Amounts Received

Applicable option is checked

- ☒ Agrees that the Trustee has paid the amounts listed on the Cure Notice towards the Creditor's claim.
- ☐ Disagrees that the Trustee has paid the amounts listed on the Cure Notice towards Creditor's claim. Creditor states that the total amount received as of the date of this response is:

Total Amount Due: \$0.00

Attached is an itemized Statement of amounts paid through the date listed on the Statement.

#### Post-Petition Amounts Outstanding

Applicable option is checked

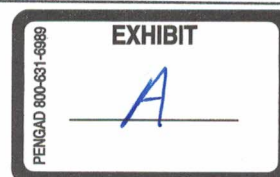
- ☐ Agrees that Debtors are current with respect to all post-petition payments, fees and costs, whether paid directly to Creditor or being paid through Debtor's Chapter 13 Plan as of the date of this response.
- ☒ Disagrees that Debtors are current with respect to all post-petition payments, fees and costs as of the date of the Cure Notice and states that the total amount to cure the post-petition arrearage as of the date of this response is:

Total Amount Due: \$12,752.48

\*

Attached is an itemized Statement of the post-petition arrearage due and owing through the date listed on the Statement. The outstanding amounts identified on the Statement do not reflect amounts that became or may become due after the date listed therein, including any fees that may have been incurred in the preparation, filing or prosecution of this Cure Notice.

The outstanding amounts identified on the attached Statements may not, due to timing, reflect all payments sent to Creditor as of the date stated therein. In addition, the amounts due may include payments reflected on the Notice of Amount Deemed Necessary to Cure Mortgage Arrears but which have not yet been received and/or processed by Creditor.



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X /s/ PAUL KIM  
Signature

X 05/02/2019  
Date (MM/DD/YYYY)

First Name: PAUL Middle Name: Last Name: KIM  
Title: Attorney for Creditor  
Company: BARRETT DAFFIN FRAPPIER TURNER & ENGEL, LLP  
Address: 4004 Belt Line Rd Ste. 100  
City: ADDISON State: TX Zip: 75001  
Phone: (972) 386-5040

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### CERTIFICATE OF SERVICE

I hereby certify that on May 02, 2019, a true and correct copy of the Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears Under L.B.R. 3002-2 was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER  
TURNER & ENGEL, LLP

BY: /s/ PAUL KIM

05/02/2019

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PAUL KIM  
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ATTORNEY FOR CREDITOR

Case No: 17-43890-ELM-13

## UNITED STATES BANKRUPTCY COURT

**BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL:**

**DEBTOR:**

ANGEL REE SANSOM  
2315 WESTBROOK DRIVE  
CARROLLTON, TX 75007

**DEBTOR'S ATTORNEY:**

RICHARD M. WEAVER  
5601 AIRPORT FRWY.  
FORT WORTH, TX 76117

**TRUSTEE:**

PAM BASSEL  
7001 BLVD 26  
SUITE 150  
NORTH RICHLAND HILLS, TX 76180

**UNITED STATES TRUSTEE:**

1100 COMMERCE STREET  
ROOM 976  
DALLAS, TX 75242